

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
6-CA-301050Date Filed
8/10/22

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

| | | |
|---|---|--|
| a. Name of Employer Westinghouse Arts Academy Charter School | | b. Tel. No. 412-646-1718 |
| | | c. Cell No. |
| | | f. Fax No. |
| d. Address (Street, city, state, and ZIP code) 320 Marguerite Avenue Wilmerding, PA 15148 | e. Employer Representative (b) (6), (b) (7)(C) | g. e-mail (b) (6), (b) (7)(C)@westinghs |
| h. Number of workers employed Approx. 30 in b/u | | |
| i. Type of Establishment (factory, mine, wholesaler, etc.) Charter School | j. Identify principal product or service Education | |

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

On or about (b) (6), (b) (7)(C) 2022, the above-named Employer, acting through its officers, agents and representatives, discriminated against its employee (b) (6), (b) (7)(C) in regard to hire or tenure of employment to discourage membership in and activities on behalf of Westinghouse Arts Academy Charter Education Association, a labor organization; the Employer discharged (b) (6), (b) (7)(C) because (b) (6), (b) (7)(C) engaged in Union activity and in order to retaliate against (b) (6), (b) (7)(C) for said activities and to discourage other employees in the exercise of the rights protected under Section 7 of the Act.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Westinghouse Arts Academy Charter Education Association PSEA/NEA

| | |
|---|------------------------------|
| 4a. Address (Street and number, city, state, and ZIP code) 10 South 19th Street, 3rd Floor Pittsburgh, PA 15203 | 4b. Tel. No. 412-381-2400 |
| | 4c. Cell No. |
| | 4d. Fax No. 412-432-2034 |
| | 4e. e-mail |

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Pennsylvania State Education Association/ National Education Association

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

Tel. No.
240-818-1108Office, if any, Cell No.
412-368-5541Fax No.
412-489-0174e-mail
amanda@eblaborlaw.com


(signature of representative or person making charge)

Amanda B. Bundick, Attorney
(Print/type name and title or office, if any)

Address P.O. Box 44290, Pittsburgh, PA 15205 Date August 9, 2022

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 6
1000 Liberty Ave Rm 904
Pittsburgh, PA 15222-4111

Agency Website: www.nlr.gov
Telephone: (412)395-4400
Fax: (412)395-5986



Download
NLRB
Mobile App

August 10, 2022

(b) (6), (b) (7)(C)

Westinghouse Arts Academy Charter School
320 Marguerite Avenue
Wilmerding, PA 15148

Re: Westinghouse Arts Academy Charter School
Case 06-CA-301050

Dear (b) (6), (b) (7)(C)

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Examiner ERIC J. KELLY whose telephone number is (412)690-7108. If this Board agent is not available, you may contact Regional Attorney RENEE D. MCKINNEY whose telephone number is (412)690-7109.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not

August 10, 2022

enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

Prohibition on Recording Affidavit Interviews: It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

Correspondence: All documents submitted to the Region regarding your case MUST be filed through the Agency's website, www.nlr.gov. This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

August 10, 2022

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlr.gov or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Nancy Wilson", is written in a cursive style.

Nancy Wilson
Regional Director

:cjc

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 6
1000 Liberty Ave Rm 904
Pittsburgh, PA 15222-4111

Agency Website: www.nlr.gov
Telephone: (412)395-4400
Fax: (412)395-5986



Download
NLRB
Mobile App

August 10, 2022

Westinghouse Arts Academy
Charter Education Association
10 South 19th Street, 3rd Floor
Pittsburgh, PA 15203

Re: Westinghouse Arts Academy Charter School
Case 06-CA-301050

Dear Sir or Madam:

The charge that you filed in this case on August 10, 2022 has been docketed as case number 06-CA-301050. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Examiner ERIC J. KELLY whose telephone number is (412)690-7108. If this Board agent is not available, you may contact Regional Attorney RENEE D. MCKINNEY whose telephone number is (412)690-7109.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

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Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlrb.gov or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

August 10, 2022

Very truly yours,

A handwritten signature in black ink, appearing to read "Nancy Wilson". The signature is fluid and cursive, with the first name "Nancy" and last name "Wilson" clearly distinguishable.

Nancy Wilson
Regional Director

:cjc

cc: Amanda B. Bundick, Attorney
PO Box 44290
Pittsburgh, PA 15205-0690

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

| |
|---|
| Westinghouse Arts Academy Charter Education Association |
| and |
| Westinghouse Arts Academy Charter School |

CASE 06-CA-301050

| | | |
|---|--|--|
| <input checked="" type="checkbox"/> REGIONAL DIRECTOR | <input type="checkbox"/> EXECUTIVE SECRETARY NATIONAL LABOR RELATIONS BOARD Washington, DC 20570 | <input type="checkbox"/> GENERAL COUNSEL NATIONAL LABOR RELATIONS BOARD Washington, DC 20570 |
|---|--|--|

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____
Westinghouse Arts Academy Charter School

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

| | |
|---|-------------------|
| NAME: Paul N. Lalley | |
| MAILING ADDRESS: Campbell Durrant, P.C. 535 Smithfield Street, Suite 700, Pittsburgh, PA 15222 | |
| E-MAIL ADDRESS: plalley@cdblaw.com | |
| OFFICE TELEPHONE NUMBER: 412-395-1280 | |
| CELL PHONE NUMBER: 412-337-2052 | FAX: 412-395-1291 |
| SIGNATURE: _____ (Please sign in ink.) | |
| DATE: _____ | |

¹ IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

| |
|---|
| Westinghouse Arts Academy Charter Education Association |
| and |
| Westinghouse Arts Academy Charter School |

CASE
06-CA-301050

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

☐ GENERAL COUNSEL
NATIONAL LABOR RELATIONS BOARD
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF _____

Westinghouse Arts Academy Charter School

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

| | | | |
|--------------------------|---|------|---------------------|
| NAME: | <u>Paul N. Lalley</u> | | |
| MAILING ADDRESS: | <u>Campbell Durrant, P.C.</u> | | |
| | <u>535 Southfield Street, Suite 700 Pittsburgh PA 15222</u> | | |
| E-MAIL ADDRESS: | <u>plalley@cdblaw.com</u> | | |
| OFFICE TELEPHONE NUMBER: | <u>412-395-1280</u> | | |
| CELL PHONE NUMBER: | <u>412-337-2052</u> | FAX: | <u>412-395-1291</u> |
| SIGNATURE: | <u></u> | | |
| | <i>(Please sign in ink.)</i> | | |
| DATE: | <u></u> | | |

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**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION SIX**

**WESTINGHOUSE ARTS ACADEMY CHARTER
SCHOOL,**

Respondent

and

Case 06-CA-301050

**WESTINGHOUSE ARTS ACADEMY CHARTER
EDUCATION ASSOCIATION,**

Charging Party

COMPLAINT AND NOTICE OF HEARING

This Complaint and Notice of Hearing is based on a charge filed by Westinghouse Arts Academy Charter Education Association (Charging Party). It is issued pursuant to Section 10(b) of the National Labor Relations Act (the Act), 29 U.S.C. § 151 et seq., and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (the Board) and alleges that Westinghouse Arts Academy Charter School (Respondent) has violated the Act as described below.

1. The charge in this proceeding was filed by the Charging Party on August 10, 2022, and a copy was served on Respondent by U.S. mail on August 10, 2022.

2. At all material times, Respondent, a Pennsylvania corporation, with an office and place of business in Wilmerding, Pennsylvania, herein called the Respondent's facility, has been engaged in the business of operating a charter school for Grades 9-12.

3. (a) Annually, Respondent, in conducting its operations described above in paragraph 2, derived gross revenues in excess of \$1,000,000.

(b) Annually, Respondent, in conducting its operations described above in

paragraph 2, purchased and received at the Respondent's facility goods valued in excess of \$5,000 directly from points outside the Commonwealth of Pennsylvania.

4. At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

5. At all material times, the Charging Party has been a labor organization within the meaning of Section 2(5) of the Act.

6. At all material times, the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act and agents of Respondent within the meaning of Section 2(13) of the Act:

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

7. (a) About February 18, 2022, employee (b) (6), (b) (7)(C) raised safety concerns at an all-staff meeting.

(b) About February 18, 2022, (b) (6), (b) (7)(C) raised safety concerns at a meeting with (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

(c) About February 23, 2022, (b) (6), (b) (7)(C) raised safety concerns at a meeting with (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

(d) By the conduct described above in in paragraph 7(a-c), (b) (6), (b) (7)(C) engaged in concerted activities with other employees for the purposes of mutual aid and protection.

8. (a) About (b) (6), (b) (7)(C) 2022, Respondent suspended its employee (b) (6), (b) (7)(C)

(b) About (b) (6), (b) (7)(C) 2022, Respondent discharged its employee (b) (6), (b) (7)(C)

9. Respondent engaged in the conduct described above in paragraph 8(a-b), because (b) (6), (b) (7)(C) engaged in the conduct described above in paragraph 7(a-d), and to discourage employee(s) from engaging in these or other concerted activities.

10. Respondent engaged in the conduct described above in paragraph 8(a-b) because (b) (6), (b) (7)(C) formed, joined, and assisted the Charging Party and engaged in concerted activities, and to discourage employees from engaging in these activities.

11. By the conduct described above in paragraphs 8(a-b) and 9, Respondent has been interfering with, restraining, and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

12. By the conduct described above in paragraphs 8(a-b) and 10, Respondent has been discriminating in regard to the hire or tenure or terms or conditions of employment of its employees, thereby discouraging membership in a labor organization in violation of Section 8(a)(3) and (1) of the Act.

13. The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

REMEDY

As part of the remedy for the unfair labor practices alleged above the General Counsel seeks an Order requiring Respondent to reimburse (b) (6), (b) (7)(C) for any and all consequential damages (b) (6), (b) (7)(C) may have incurred as a result of (b) (6), (b) (7)(C) discharge.

The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before May 26, 2023, or postmarked on or before May 25, 2023.** Respondent also must serve a copy of the answer on each of the other parties.

The answer must be filed electronically through the Agency's website. To file electronically, go to www.nlr.gov, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. Responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if

an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on **January 8, 2024, 10:00 AM at 1000 Liberty Avenue, Room 904, Pittsburgh, PA 15222**, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: May 12, 2023

/s/ Nancy Wilson

NANCY WILSON
REGIONAL DIRECTOR
NATIONAL LABOR RELATIONS BOARD
REGION SIX
1000 Liberty Ave., Room 904
Pittsburgh, PA 15222-4111

Attachments

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 6**

**WESTINGHOUSE ARTS ACADEMY CHARTER
SCHOOL**

Respondent

and

Case 06-CA-301050

**WESTINGHOUSE ARTS ACADEMY CHARTER
EDUCATION ASSOCIATION**

Charging Party

AFFIDAVIT OF SERVICE OF: Complaint and Notice of Hearing (with forms NLRB-4338 and NLRB-4668 attached)

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on May 12, 2023, I served the above-entitled document(s) by **certified or electronic mail**, as noted below, upon the following persons, addressed to them at the following addresses:

(b) (6), (b) (7)(C)

ELECTRONIC MAIL

Westinghouse Arts Academy Charter School
320 Marguerite Avenue
Wilmerding, PA 15148
(b) (6), (b) (7)(C)@westinghousearts.org

Paul N. Lalley , Esq.
Campbell Durrant, P.C.
535 Smithfield Street
Suite 700
Pittsburgh, PA 15222
plalley@cdblawn.com

ELECTRONIC MAIL

Jonathan F. Whalen
Campbell Durrant, P.C.
535 Smithfield Street
Suite 700
Pittsburgh, PA 15222
jwhalen@cdblawn.com

ELECTRONIC MAIL

Amanda B. Bundick , Attorney
PO Box 44290
Pittsburgh, PA 15205-0690
amanda@elaborlaw.com

ELECTRONIC MAIL

Westinghouse Arts Academy Charter
Education Association
10 South 19th Street, 3rd Floor
Pittsburgh, PA 15203

CERTIFIED MAIL

May 12, 2023

Date

Kristin McGeorge, Designated Agent of NLRB

Name

/s/ Kristin McGeorge

Signature

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
NOTICE

Case 06-CA-301050

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

(b) (6), (b) (7)(C)

Westinghouse Arts Academy Charter School
320 Marguerite Avenue
Wilmerding, PA 15148

Paul N. Lalley , ESQ.
Campbell Durrant, P.C.
535 Smithfield Street
Suite 700
Pittsburgh, PA 15222

Jonathan F. Whalen
Campbell Durrant, P.C.
535 Smithfield Street
Suite 700
Pittsburgh, PA 15222

Westinghouse Arts Academy Charter
Education Association
10 South 19th Street, 3rd Floor
Pittsburgh, PA 15203

Amanda B. Bundick , Attorney
PO Box 44290
Pittsburgh, PA 15205-0690

Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: www.nlrb.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf.

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at www.nlrb.gov, click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement. The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered in evidence. If a copy of any exhibit is not available when the original is received, it will be the responsibility

of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 6**

**WESTINGHOUSE ARTS ACADEMY CHARTER
SCHOOL**

Respondent

and

Case 06-CA-301050

**WESTINGHOUSE ARTS ACADEMY CHARTER
EDUCATION ASSOCIATION**

Charging Party

AFFIDAVIT OF SERVICE OF: Complaint and Notice of Hearing (with forms NLRB-4338 and NLRB-4668 attached)

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on May 12, 2023, I served the above-entitled document(s) by **certified or electronic mail**, as noted below, upon the following persons, addressed to them at the following addresses:

(b) (6), (b) (7)(C)

ELECTRONIC MAIL

Westinghouse Arts Academy Charter School
320 Marguerite Avenue
Wilmerding, PA 15148
(b) (6), (b) (7)(C)@westinghousearts.org

Paul N. Lalley , Esq.
Campbell Durrant, P.C.
535 Smithfield Street
Suite 700
Pittsburgh, PA 15222
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Jonathan F. Whalen
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Amanda B. Bundick , Attorney
PO Box 44290
Pittsburgh, PA 15205-0690
amanda@elaborlaw.com

ELECTRONIC MAIL

Westinghouse Arts Academy Charter
Education Association
10 South 19th Street, 3rd Floor
Pittsburgh, PA 15203

CERTIFIED MAIL

May 12, 2023

Date

Kristin McGeorge, Designated Agent of NLRB

Name

/s/ Kristin McGeorge

Signature

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
NOTICE

Case 06-CA-301050

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

(b) (6), (b) (7)(C)

Westinghouse Arts Academy Charter School
320 Marguerite Avenue
Wilmerding, PA 15148

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Amanda B. Bundick , Attorney
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**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 6**

**WESTINGHOUSE ARTS ACADEMY
CHARTER SCHOOL**

and

Case 06-CA-301050

**WESTINGHOUSE ARTS ACADEMY
CHARTER EDUCATION
ASSOCIATION**

ANSWER TO COMPLAINT

Respondent, Westinghouse Arts Academy Charter School (“Respondent” or “School”), by and through its undersigned counsel, hereby submits this Answer to the Complaint, and in support thereof, states the following:

GENERAL DENIAL

Except as otherwise expressly stated herein, Respondent denies each and every allegation contained in the Complaint, including, without limitation, any allegations contained in the preamble, headings, or subheadings of the Complaint. Respondent specifically denies that it violated the National Labor Relations Act (“NLRA”) in any of the ways alleged in the Complaint or in any other way. Respondent expressly reserves the right to seek to amend and/or supplement its Answer as may be necessary.

DEFENSES

Without assuming any burden of proof, persuasion or production not legally assigned to it regarding any element of the claims alleged in the Complaint, Respondent asserts the following defenses:

1. The Complaint and each purported claim for relief stated therein fail to allege facts sufficient to state a claim upon which relief may be granted.

2. Respondent has not violated the National Labor Relations Act (“NLRA”) in any manner.

3. Respondent has not violated the NLRA specifically because it has not interfered with, restrained or coerced any employees in the exercise of their rights protected by the NLRA, nor has it unlawfully discriminated against any employees in regard to the hire or tenure or terms and conditions of employment of its employees, nor has it taken any action to discourage membership in any labor organization in violation of the NLRA.

4. Respondent further asserts that the actions it took and which are referenced in Paragraph 8(a) and (b) of the Complaint were not motivated by any protected activity that (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) may or may not have engaged in and were instead motivated by (b) (6), (b) (7)(C) multiple instances of misconduct and the numerous complaints that were filed against (b) (6), (b) (7) by (b) (6), (b) (7) colleagues and others with the School and the School’s reasonable belief, owing to such misconduct and complaints, that liability to the School could result if (b) (6), (b) (7) remained employed, among other factors not in any manner related to any protected activity that (b) (6), (b) (7) may or may not have engaged in.

5. Respondent further asserts that the actions it took and which are referenced in Paragraph 8(a) and (b) of the Complaint were not motivated by whether (b) (6), (b) (7) formed, joined, and

assisted the Charging Party and engaged in concerted activities, nor were they designed or intended to discourage employees from engaging in these activities, but were instead motivated by (b) (6), (b) (7)(C) multiple instances of misconduct and the numerous complaints that were filed against (b) (6), (b) (7)(C) by (b) (6), (b) (7)(C) colleagues and others with the School and the School's reasonable belief, owing to such misconduct and complaints, that liability to the School could result if (b) (6), (b) (7)(C) remained employed, among other factors not in any manner related to any union-related activity that (b) (6), (b) (7)(C) or any other employees may or may not have engaged in.

6. Respondent further disputes the accuracy and completeness of the characterization in Paragraphs 7 (a)-(d) the Complaint of (b) (6), (b) (7)(C) activity, which merely claim that (b) (6), (b) (7)(C) raised "safety concerns," and Respondent further disputes whether such activity *per se* constituted protected activity under the National Labor Relations Act.

7. Respondent further asserts that the National Labor Relations Board lacks jurisdiction over Respondent or any other public charter school organized and operating pursuant to Pennsylvania's Charter School Law, 24 P.S. §§ 17-1701, *et seq.*

RESPONSES TO SPECIFIC ALLEGATIONS IN THE COMPLAINT

1. After reasonable investigation, Respondent is without knowledge or information sufficient to form a belief as to the truth of the averments of Paragraph 1, except to admit that subsequent to August 10, 2022, it received a copy of the charge in Case 06-CA- 301050.

2. Admitted.

3. (a) The factual averments in Paragraph 3(a) are admitted, however, to the extent that the factual averments in Paragraph 3(a) are intended to allege the jurisdiction of the National Labor Relations Board, Respondent asserts that that the National Labor Relations Board lacks

jurisdiction over Respondent or any other public charter school organized and operating pursuant to Pennsylvania's Charter School Law, 24 P.S. §§ 17-1701, *et seq.*

(b) The factual averments in Paragraph 3(b) are admitted, however, to the extent that the factual averments in Paragraph 3(b) are intended to allege the jurisdiction of the National Labor Relations Board, Respondent asserts that that the National Labor Relations Board lacks jurisdiction over Respondent or any other public charter school organized and operating pursuant to Pennsylvania's Charter School Law, 24 P.S. §§ 17-1701, *et seq.*

4. The averments in Paragraph 4 are conclusions of law to which no response is required. To the extent that the factual averments in Paragraph 4 are intended to allege the jurisdiction of the National Labor Relations Board, Respondent asserts that that the National Labor Relations Board lacks jurisdiction over Respondent or any other public charter school organized and operating pursuant to Pennsylvania's Charter School Law, 24 P.S. §§ 17-1701, *et seq.*

5. The averments in Paragraph 5 are conclusions of law to which no response is required. To the extent a response is required, Respondent is without knowledge or information sufficient to form a belief as to the truth of the averments of Paragraph 5.

6. Respondent admits that the individuals listed in Paragraph 6 of the Complaint at all material times held the titles and positions ascribed to them in the Complaint. To the extent the Complaint avers in Paragraph 6 that these individuals were supervisors and agents of Respondent within the meaning of Section 2(11) and 2(13) of the National Labor Relations Act, this constitutes a conclusion of law to which no response is required.

7. (a) Respondent admits that (b) (6), (b) (7) attended an all-staff meeting on February 18, 2022, a meeting which (b) (6) surreptitiously recorded without the consent of any attendees in violation of the Pennsylvania Wiretap Act, an act that constituted a felony under Pennsylvania law and

which prompted multiple complaints from colleagues. *See* 18 Pa.C.S.A. § 5703; Brantley v. Wysocki, 662 F. App'x 138 (3d Cir. 2016) (criminal proceedings against employee for violation of the Pennsylvania Act based on employee's unauthorized recording of meeting with her supervisor were supported by probable cause). Respondent denies whether any statements made by (b) (6), (b) (7) during this meeting can be accurately/completely described merely as the raising of “safety concerns.”

(b) Respondent admits only that following receipt of multiple complaints from School employees concerning (b) (6), (b) (7)(C) illegal recording of the February 18, 2022 all-staff meeting, (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) met with (b) (6), (b) (7) and (b) (6), (b) (7)(C), (b) (6), (b) (7)(C) (b) (6), (b) (7)(C), to inform (b) (6), (b) (7) of the complaints and to request that (b) (6) delete the illegal recording. Respondent further admits only that during this meeting between (b) (6), (b) (7), (b) (6), (b) (7)(C), (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C), (b) (6), (b) (7) raised concerns (b) (6) had regarding (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) on February 18, 2022, and that (b) (6), (b) (7)(C) responded to (b) (6), (b) (7)(C) concerns by offering (b) (6), (b) (7) advice regarding how to communicate with this student and address (b) (6), (b) (7) special needs in an appropriate manner.

(c) Respondent admits only that during a meeting on February 23, 2022, which was attended by (b) (6), (b) (7), (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), and (b) (6), (b) (7)(C), and during which an instance of (b) (6), (b) (7)(C) insubordination with respect to (b) (6), (b) (7)(C) was discussed, that (b) (6), (b) (7) raised concerns (b) (6) had regarding (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) on February 18, 2022, and that (b) (6), (b) (7)(C) responded to (b) (6), (b) (7)(C) concerns by offering (b) (6), (b) (7) advice regarding how to communicate with (b) (6), (b) (7)(C) and address (b) (6), (b) (7)(C) in an appropriate manner, but explained that (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)

(d) The averments in Paragraph 7(d) are conclusions of law to which no response is required. To the extent a response is required, the averments are denied.

8. (a) Admitted.

(b) Admitted.

9. Respondent vigorously denies that it suspended and terminated (b) (6), (b) (7) because of any protected activity that (b) (6), (b) (7) may or may not have engaged in or to discourage employees from engaging in any such activities. Instead, Respondent suspended and then terminated (b) (6), (b) (7) due to (b) (6), multiple instances of misconduct and the numerous complaints that were filed against (b) (6), (b) (7) by (b) (6), colleagues and others with the School, including but not necessarily limited to 1) (b) (6), illegal recording of the February 18, 2022 meeting, 2) (b) (6), (b) (7) inappropriate (b) (6), (b) (7)(C) (b) (6), (b) (7)(C), 3) (b) (6), (b) (7) repeated instances of harassing and intimidating behavior directed toward (b) (6), colleagues, behavior which prompted complaints from the affected colleagues and led to them, in some instances, calling off work out of fear of interacting with (b) (6), (b) (7), 4) (b) (6), repeated failure to properly monitor (b) (6), students, and 5) Respondent's reasonable fear that (b) (6), (b) (7)(C) continued employment, due to (b) (6), ongoing intimidating, harassing, and inappropriate behavior, would lead to liability for the School.

10. Respondent vigorously denies that it suspended and terminated (b) (6), (b) (7) because (b) (6), (b) (7) may or may not have formed, joined, and assisted the Charging Party in any protected activity or to discourage employees from engaging in any such activities. Instead, Respondent suspended and then terminated (b) (6), (b) (7) due to (b) (6), multiple instances of misconduct and the numerous complaints that were filed against (b) (6), (b) (7) by (b) (6), colleagues and others with the School, including but not necessarily limited to 1) (b) (6), illegal recording of the February 18, 2022 meeting, 2) (b) (6), inappropriate (b) (6), (b) (7)(C), 3) (b) (6), repeated instances of harassing and

intimidating behavior directed toward (b) (6), (b) (7)(C) colleagues, behavior which prompted complaints from the affected colleagues and led to them, in some instances, calling off work out of fear of interacting with (b) (6), (b) (7)(C), 4) (b) (6), (b) (7)(C) repeated failure to properly monitor (b) (6), (b) (7)(C) students, and 5) Respondent's reasonable fear that (b) (6), (b) (7)(C) continued employment, due to (b) (6), (b) (7)(C) ongoing intimidating, harassing, and inappropriate behavior, would lead to liability for the School.

11. The averments in Paragraph 11 are conclusions of law to which no response is required. To the extent a response is required, the averments are denied. Respondent has not violated the NLRA in any manner and it has not interfered with, restrained or coerced any employees in the exercise of their rights protected by the NLRA.

12. The averments in Paragraph 12 are conclusions of law to which no response is required. To the extent a response is required, the averments are denied. Respondent has not violated the NLRA in any manner and it has not unlawfully discriminated against any employees in regard to the hire or tenure or terms and conditions of employment of its employees, nor has it taken any action to discourage membership in any labor organization in violation of the NLRA.

13. The averments in Paragraph 13 are conclusions of law to which no response is required. To the extent a response is required, the averments are denied. Respondent has not committed any unfair labor practices and to the extent that Paragraph 13 alleges facts that are intended to establish the jurisdiction of the National Labor Relations Board, Respondent asserts that that the National Labor Relations Board lacks jurisdiction over Respondent or any other public charter school organized and operating pursuant to Pennsylvania's Charter School Law, 24 P.S. §§ 17-1701, *et seq.*

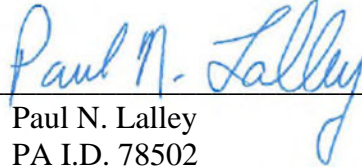
RESPONSES TO REQUESTED REMEDIES

The Remedy section of the Complaint does not allege facts for which an answer is required, but rather relates the remedy sought by the General Counsel and, accordingly, no response is required. To the extent that a response may be deemed to be necessary, Respondent denies that the General Counsel is entitled to the remedies, or that the Board can order the remedies requested.

Respondent reserves the right to raise any additional defenses not asserted herein of which it may become aware through investigation as may be appropriate at a later time.

Respectfully Submitted,

CAMPBELL DURRANT, P.C.



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(412) 395-1264

Attorneys for Westinghouse Arts Academy
Charter School

Dated: May 25, 2023


CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **Answer to Complaint** has been served upon all parties either individually or through counsel by:

| | |
|---------------|--|
| <u> X </u> | Email |
| <u> </u> | Hand Delivery |
| <u> </u> | Federal Express |
| <u> </u> | First Class, U.S. Mail, Postage Paid |
| <u> </u> | Certified Mail, Return Receipt Requested |

at the following address(es):

Amanda Bundick, Esquire
Eberle & Bundick, LLC
PO BOX 44290
Pittsburgh, PA 15205
amanda@eblaborlaw.com



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Dated: May 25, 2023